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By Recall Management Division at 7:53 am, May 09, 2013

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On May 2, ~~2008~~, 2013 Kovatch Mobile Equipment Corp. [MFR] decided that (a defect which relates to motor vehicle safety) ~~(a noncompliance with Federal Motor Vehicle Safety Standard No. XXXXXXXX)~~ exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 **Defect and Noncompliance Responsibility and Reports**.

Date this report was prepared: May 7, 2013

Furnish the manufacturer's identification code for this recall (if applicable): 2013-E01

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Kovatch Mobile Equipment Corp., One Industrial Complex, Nesquehoning, PA 18240

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Jack Terefinko - Vice President, Senior Director of Engineering

Telephone Number: (570) 669-5154 **Fax No.:** (570) 669-9966

Name and Title of Person who prepared this report.

Steven M. Cormier, General Counsel

Signed:

¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:

Make(s): KME **Model Years Involved:** 2009-2013 **Model(s):** Predator, Predator SS, Panther, Panther II

Production Dates: Beginning: 9/2008 **Ending:** 04/2013

VIN Range: Beginning: 1K9AF42809N058646 **Ending:** 1K9AF8885CN058292
Fire fighting

Vehicle Type: Apparatus **Bodystyle:** Pumper, Rescue, Aerial, Tanker and ARFF vehicles

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Recalled vehicles have a grease fitting in the steering column shaft that may get caught in the rubber steering column cover.

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Make(s): _____ **Model Years Involved:** _____ **Model(s):** _____

Production Dates: Beginning: _____ **Ending:** _____

VIN Range: Beginning: _____ **Ending:** _____

Vehicle Type: _____ **Bodystyle:** _____

Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period. 39%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
Predator	2009-2013	341
Predator SS	2009-2013	172
Panther	2009-2013	63
Panther II	2010-2013	112
ARFF	2010-2011	7

Total Number Potentially Affected by the Recall: 695

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 39%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

KME determined that all KME Predator, Predator SS, Panther, and Panther II custom chassis manufactured during the period from September 2008 through April 2013 were equipped with steering column shafts in which a grease fitting was installed in close proximity to the rubber steering column cover ("boot"). Vehicles manufactured prior to or subsequent to that time period do not have such a grease fitting.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The defect involves the potential for the grease fitting in the steering column shaft to get caught in the rubber steering column cover.

The problem could occur when the steering column shaft boot is stepped on over time and is then compressed below the grease fitting (see attached photograph). If the problem occurs, the grease fitting can catch and tear the cover or result in a change in handling characteristics of the vehicle, which may result in an accident.

Describe the cause(s) of the defect or noncompliance condition.

When the steering column shaft boot is stepped on over time and gets compressed below the grease fitting, the grease fitting can catch and tear the rubber steering column cover or result in a change in handling characteristics of the vehicle which may result in an accident.

Describe the consequence(s) of the defect or noncompliance condition.

If the steering shaft boot gets snagged on the grease fitting, it may result in a change in handling characteristics of the vehicle, which may result in an accident.

Identify any warning which can (a) precede or (b) occur.

None

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Kovatch Mobile Equipment Corp., One Industrial Complex, Nesquehoning, PA 18240.

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Edward J. Opella, Supervisor - Warranty Administration (570-669-5173)

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

6. In late April 2013, Kovatch Mobile Equipment Corp. was notified by a customer that the steering shaft boot snagged on the grease fitting, resulting in interference with the free movement of the steering shaft. Thereafter, KME inspected the vehicle and determined that when the steering column shaft boot is stepped on over time, it can get compressed below the grease fitting, which can then catch and tear the rubber steering column or result in a change in handling characteristics, which may result in an accident. This incident was the only report that KME has received regarding the issue. KME is aware of no other incidents.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Kovatch Mobile Equipment Corp. will notify affected customers of the recall and provide instructions to customers regarding repair of the defect or the scheduling of an appointment for Kovatch Mobile Equipment Corp. to perform the repair.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

The remedy consists of removal of the grease fitting and sanding smooth any sharp edges created by its removal to prevent damage to the steering column cover. The opening created by removal of the grease fitting will remain open; a plug is not required. In the recall condition, the grease fitting is present on the steering column shaft; upon completion of the remedy, the grease fitting is no longer present.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The grease fitting is removed, and any sharp edges created by its removal are sanded smooth to prevent damage to the steering column cover. The opening created by removal of the grease fitting remains open; a plug is not required. Prior to the remedy, the grease fitting is present on the steering column shaft.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

After the initial factory lubrication of the steering shaft, further lubrication is not necessary. Since in-service lubrication is no longer required, the grease fitting can be removed. Said production remedy was commenced in late April 2013.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Kovatch Mobile Equipment Corp. expects to notify all affected customers on or before May 20, 2013. At this time, no foreseeable problems exist with implementing the recall.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

